

### REMARKS

This application has been reviewed in light of the Office Action dated March 19, 2008. Claims 18-28 are pending. Claims 18 and 23 are in independent form. Claims 18-20, 23-25 and 27 have been amended to define more clearly what Applicant regards as his invention. Favorable reconsideration is respectfully requested.

In the outstanding Office Action, Claims 18-28 were rejected under 35 U.S.C. § 112, second paragraph, for alleged indefiniteness.

The claims have been carefully reviewed and amended as deemed necessary to ensure that they conform fully to the requirements of Section 112, second paragraph, with special attention to the points raised in the Office Action. It is believed that the rejection under Section 112, second paragraph, has been obviated, and its withdrawal is therefore respectfully requested.

In addition, Claims 18, 19, 23-25 and 28 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication 2004/0153597 (Kanai et al.), and Claims 21, 22, 26 and 27 were rejected under 35 U.S.C. § 103(a) as being obvious from *Kanai* in view of U.S. Patent Application Publication 2003/0172223 (Ying et al.).

As discussed in the specification, one main objective of the present invention is to improve the operability and functionality upon connection between an information processing apparatus, such as a printer, and external units, such as a personal computer and a digital still camera. The present invention meets this objective by providing a apparatus comprising type AB USB connectors, each connectable with both a USB host or a USB device (but connected to only one of them at a time), a USB host

controller and a USB device controller, and a switch to choose one of the two USB controllers for a given external unit connected with one of the USB connectors depending on the type of external unit – a USB host or a USB device. The USB device controller is chosen if a USB host is connected with the USB connector, and the USB host controller is chosen if a USB device is connected with the USB connector.

Among other notable features recited in each of the present independent claims, is that

(1) the connectors are connectable with both the USB host and USB device, and

(2) the types of the external apparatuses connected to the connectors are determined, and if it is determined that the plurality of connected external apparatuses include one or more USB device apparatuses and one or more USB host apparatuses, the switching unit connects the USB device apparatus with the USB host controller and the USB host apparatus with the USB device controller.

To the contrary, conventionally, a USB connector and a USB controller are fixedly connected. For example, as shown in *Kanai*, the connector 31A and the USB host controller 23 are fixedly connected and this causes lack of connection flexibility. *Kanai* also teaches the connectors 31B and 31C are connected to the USB host controller 23 and the USB function controller 24 via the multiplexers 29, 30. However, it is apparent from the disclosure of *Kanai* that the connectors 31B and 31C *cannot* be used at the same time. That is, according to *Kanai*, one of the connectors 31B and 31C, and one of the controllers 23 and 24 is always not in use.

Thus, Applicant submits that *Kanai* fails to teach or suggest the above characteristics of the apparatus of Claim 18. According to Claim 18, each of the connectors can connect any one of USB host apparatuses and USB device apparatus, and the USB host controller and the USB device controller can be used at the same time. Accordingly, the present invention, compared to the prior art, enhances connection flexibility and utilization efficiency.

Independent Claim 23 is a method claim corresponding to apparatus Claim 18, and is believed to be patentable for at least the same reasons as discussed above in connection with Claim 18.

A review of the other art of record, including *Ying*, has failed to reveal anything which, in Applicant's opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or the other of independent Claims 18 and 23, and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and allowance of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

/Leonard P. Diana/

Leonard P. Diana  
Attorney for Applicant  
Registration No. 29,296

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

FCIS\_WS 2332627v1